

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ERNESTO SANTIAGO)	C.A. No. 04-335 Erie
)	(Judge Sean J. McLaughlin)
)	
Plaintiff)	
)	ELECTRONICALLY FILED PLEADING
vs.)	
UNITED STATES OF AMERICA)	PLAINTIFF'S MOTION FOR
)	REIMBURSEMENT OF EXPENSES
)	
)	Filed on behalf of:
)	Plaintiff, Ernesto Santiago
Defendant)	
)	Counsel of record for this party:
)	Richard A. Lanzillo, Esq.
)	Knox McLaughlin Gornall
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PLAINTIFF'S MOTION FOR REIMBURSEMENT OF EXPENSES

Plaintiff, Ernesto Santiago, through his counsel, Knox McLaughlin Gornall & Sennett, P.C., files the following Motion for Reimbursement of Expenses and states in support as follows:

1. Undersigned counsel was appointed by this Honorable Court In January, 2006, and has entered its appearance on behalf of plaintiff, Ernesto Santiago, and agreed to assist him in procuring an expert analysis and report concerning any deviation from the appropriate standard of care relative to the medical treatment that plaintiff received while he was incarcerated.

2. Since the time of counsel's appointment, more specifically, since procuring Saponaro, Inc. to have this case reviewed by a certified physician, we have incurred expenses relating to the expert review of this case.

3. On March 8, 2006, payment of Seven Hundred Twenty-Five Dollars (\$725.00) was sent to Saponaro, Inc., to obtain the expert opinion in relation to this case. (A copy of the cover letter and check to Saponaro, Inc. is attached at Exhibit "A".)

4. On April 21, 2006, pursuant to Order of Court, the undersigned counsel's request to withdraw from this matter was GRANTED.

WHEREFORE, plaintiff respectfully requests that the Court reimburse the expense incurred relating to the expert review.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

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